	Case 3:07-cv-03108-JSW D	Oocument 42	Filed 02/29/2008	Page 1 of 11
1 2 3 4 5	MAUREEN E. MCCLAIN (Statemail: mcclain@kmm.com ALEX HERNAEZ (State Bar Nemail: hernaez@kmm.com KAUFF MCCLAIN & MCGUIR One Post Street, Suite 2600 San Francisco, California 941 Telephone: (415) 421-3111 Facsimile: (415) 421-0938	lo. 201441) E LLP	50)	
6 7 8 9 10	Attorneys for Defendant DOLLAR TREE STORES, INCORDENT BETH HIRSCH BERMAN (VA Email: bberman@williamsmull WILLIAMS MULLEN 999 Waterside Drive 1700 Dominion Tower Norfolk, VA 23510	Bar No. 28091)		
11 12	Telephone: (757) 629-0604 Facsimile: (757) 629-0660 Pro Hac Vice Attorneys for De DOLLAR TREE STORES, INC	fendant C.		
13 14			ISTRICT COURT	-
15	NORTI	HERN DISTRIC	T OF CALIFORN	N/A
16				
17 18	KASSONDRA BAAS and KEL individually and on behalf of al similarly situated,		DECLARAT	C 07-03108 JSW (ENE)
19	Plaintiffs,		JACOBSON	
20	<b>v</b> .		TIME:	April 4, 2008 9:00 a.m.
21	DOLLAR TREE STORES, INC	D.,		Crtrm. 2, 17th Floor Hon. Jeffrey S. White
22	Defendan	t.		FILED: June 13, 2007
23			TRIAL DATE:	No date set.
24				
25				
26				
27				
28				
KAUFF MCCLAIN & MCGUIRE LLP		-1-		
ONE POST STREET SUITE 2600 SAN FRANCISCO, CA 94104	DECLARATION OF CHARLOTTA JACOBSC	ON-ALLEN		CASE NO. C 07-03108 JSW (ENE)

MCGUIRE LL ONE POST STREET SUITE 2600 SAN FRANCISCO, CA 94104 TELEPHONE (415) 421-3111

- I. Charlotta Jacobson-Allen, declare as follows:
- I am over the age of eighteen and have personal knowledge of the facts set forth below. If called upon as a witness, I could testify competently thereto.
  - I am employed by Williams Mullen, P.C. as a paralegal. 2.
- Paula Brady, a Human Resources Paralegal with Dollar Tree provided me 3. with punch audit reports for stores 1868, 1561, 1878, 1990, and 2939. Plaintiffs worked at store 1868, while the remaining stores were within the same district as store 1868.
- The audit reports identify all time entries made by any given employee in a 4. store, as well as any adjustment made to that time entry, the person who made the adjustment and the date on which the adjustment was made.
- I identified any adjustment to a time entry which appeared to take time 5. away from the actual time an employee worked.
- A summary of the adjustments made to stores 1561, 1878, 1990 and 2939 6. are attached hereto as Exhibit A.
- A summary of the adjustments made to Ms. Baas's entries (Store 1868) 7. are attached hereto as Exhibit B.
- A summary of the adjustments made to Ms. Lofquist's entries (store 1868) 8. are attached hereto as Exhibit C.

I declare under penalty of perjury under the laws of the Commonwealth of Virginia that the foregoing is true and correct.

Executed in Norfolk, Virginia this  $2^{q}$ day of February, 2008.

Charlotta Jacobson-Allen

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## **EXHIBIT A**

	_	Ü		• '	
		OT AFFECTED	Q Q		
	Total Hours Worked - (change)-(punched		0.12 7 minutes 5.1212 = 5.00		
SC		Equals	7 minutes		
CHANGES ME RECORL	emper 4000	Hours Lost Equals	0.12		
SUMMARY OF CHANGES TO STORE 1561 TIME RECORDS	Sune 2006 - November 2006		Solis changes SS from 13:53 to 14:00		
		Description	Solis changes SS fi		
		EE Name	Guntz, A		
		Date	6/5/2006		

SUMMA TO STORE June 200 Description Hours	SUMMATO STORE June 200 EE Name   Description   Hours	SUMMARY OF CHANGES TO STORE 1878 TIME RECORDS June 2006 - November 2006	Date EE Name Description Hours Lost Equals (-change)-(punched lunch) NO CHANGES TOOK AWAY TIME
	EE Name	SUN TO STO	Description Ho

				(		•
	· .	SUMMARY (	SUMMARY OF CHANGES TO	s to		
		STORE 1990	STORE 1990 TIME RECORDS	RDS	-	
		June 2006 -	June 2006 - November 2006	2006		
					Total Hours Worked	
	•				-(change)-(bunched	
Date	EE Name	Description	Hours Lost Equals	Equals	lunch)	OT Affected
6/13/2006 Prado, G	Prado G	SS (5:28) Punch is changed to 5:30 by Anna Belarski	0.03	0.03 2 Minutes	8.03 - (.03) - (.50) = 7.5	Yes
		SS (12:30) & ES (12:44) Punches are				
		marked Ignore by Linda Campbell.				
6/22/2006 Miller, L	Miller, L	while the rest of this Shiff is Manual.	0.23	0.23 14 Minutes		No
<b>Total Over</b>	Total Overtime Deducted					
(Time + 1/2)	2)		0.03	0.03 2 Minutes		
	KEY					
SS = Start Shift	##45.					:
SL = Start	Lunch		•	·		
EL = End Lunch	unch			-		
ES = End Shift	Shift					

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•		SUMMARY OF CHANGES TO STORE 2939 TIME RECORDS	SUMMARY OF CHANGES STORE 2939 TIME RECOR	ES ORDS		
		June 2006 -	June 2006 - November 2006	900		
					Total Hours Worked	
•	. •				(-change)-(bunched	
Date E	EE Name	Description	Hours Lost Equals	Equals	(unch)	OT AFFECTED
					1st Shift = 1.38 hrs	
		Appears to work 2 shifts			2nd Shift = 4.98 - 40	:
7/27/2006 Degrasso, A	Jegrasso, A	2nd SS Changed by Lopez	0.4	0.4 24 Minutes =4.58	=4.58	NO NO
10/6/2006 Berumen, C	Jerumen, C	SS Changed by Runnings	0.05	0.05 3 minutes	8.55 - (.05) - (.50) = 8	YES
						•
Total Overti	Total Overtime Deducted		•	.:		
(Time + 1/2)			0.05	0.05 3 minutes		
	KEY	•				
SS = Start Shift	ihiff.					
SL = Start Lunch	unch					
EL = End Lunch	ınch			• •	- -	
ES = End Shift	iff				f	
						•

## **EXHIBIT B**

SUMMARY OF CHANGES TO BAAS TIME RECORDS

		TO BAA	TO BAAS TIME RECORDS				
			Total Hours Worked			. ,	Total Hours
	•		-(change)-(punched		Hours		(Worked (w/add) -
Date Description	Hours Lost	Equals	lunch)	Description	added	Equals	Lunch Taken)
6/27/2006 Rebecca Hansen enters SL *		0.05 3 minutes	0 69 / 49 // 51=0				·
6/27/2006 Rebecca Hansen Changed ES *		0.08 5 minutes	0-(0-0)-(01-)-0				
7/7/2006 Murphy Changed SL		0.2 12 Minutes	0 00 (3) (50)-0				
7/7/2006 Murphy Changed ES	1 0.1	0.1 6 Minutes	0-600-1-60-1-00-0				
7/10/2006 Murphy Changed ES	7 20.0	0.07 4 Minutes	8:27-(.07)-(.50)=8				
				Hansen adds time			
8/15/2006 Hansen Changes EL	0.33	0.33 20 minutes	8.85-(.33)-(.50)=8.00	to SS & ES	0.33	19.8 Minutes	0.33 19.8 Minutes  8.15-(0.53)=7.09
				Hansen adds time			
8/28/2006 Hansen Changes EL	0.5	.0.5 30 Minutes	9.3-(.50)-(.80)=8.00	to ES	0.37	0.37 22.2 Minutes 8.56-(.56)=8	8.56-(.56)=8
10/3/2006 Hansen Changes St.	0.13	0.13 8 Minutes	8.67-(.13)-(.533)=8.00				
11/3/2006 Hansen Changed ES	0.18	9	8.76-(.18)-(.60)=7.98				
11/10/2006 Hansen Manual EL	90.08	•	8.58-(.58)=8				
12/1/2006 Hansen Changed ES	0.083		8.6 - (.083)-(.516)= 8				
Total Overtime Deducted	1.803	1.803 1 hour 48 Minutes			0.7	0.7 42 Minutes	
Total Regular Time Added		: " 1					
	-0.7	-0.7 42 Minutes		?			
Overtime	1.103	1.103 1 hour 6 minutes				,	
KEY							
SS = Start Shift	· . ·				•		
SL = Start Lunch					•	•	
EL = End Lunch			•				
ES = End Shift							

## **EXHIBIT C**

·		SUMMARY OF CHANGE TO LOFQUIST HOURS	
Date	Description	Hours Lost Equals	Total Hours Worked (-change)-(physical lunch)
	Hansen Manual Lunch & Changed ES	0.69 71 minutos	s   9.18 - (.68)-(.5)= 8
Total OT	d Ollanged Ed	0.68	5 9.16 - (.08)-(.5)= 8